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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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|---|---|
| WILLIAM F. WINGATE,<br><br>Plaintiff,<br><br>v.<br><br>CYNTHIA WHITLATCH,<br><br>Defendant. | NO. 2:15-cv-00822-RAJ<br><br>DEFENDANT'S PROPOSED VOIR DIRE |

Defendant submits the following proposed voir dire questions.

1. Raise your hand if you have any type of education, experience, training, or other specialized knowledge in any of the following areas.

    a. Law, the courts, or the legal system
    b. Law enforcement
    c. Civil rights or civil justice
    d. Teach or education
    e. Social work
    f. Health care or physical or occupational therapy

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2. Raise your hand if you have served in the United States military.

3. Raise your hand if you have served in a leadership position on a board, for example the school board, a charitable organization, a community organization, or a religious organization.

4. Raise your hand if you follow the local news, read the local Seattle Times, or other local weekly magazines, such as the Seattle Weekly or the Stranger.

5. Raise your hand if you have a negative attitude or feeling toward law enforcement or police in general.

6. Raise your hand if someone close to you has a negative attitude or feeling toward law enforcement or police in general.

7. Raise your hand if you have had a very negative experience with a law enforcement officer.

8. Raise your hand if someone close to you has had a very negative experience with a law enforcement officer.

9. If a police officer and a citizen had a dispute about what happened, raise your hand if you would have a tendency to believe that either the police officer or the citizen was telling the truth.

10. Raise your hand if you believe the law enforcement tends to engage in racial profiling.

11. Raise your hand if you tend to believe that law enforcement treats members of minority groups unfairly.

12. Raise your hand if you believe you have ever been treated unfairly because of your membership in a group or your physical characteristics.

13. Raise your hand if you would have the tendency to disobey the police if you believe their actions are not justified.

14. Raise your hand if you have any feelings about the City of Seattle Police department, either positive or negative.

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15. Raise your hand if you tend to follow news or social media accounts of events involving the Seattle Police Department.

16. Raise your hand if you tend to follow news or social media accounts of events involving law enforcement and members of minority groups that have been reported across the county.

17. Raise your hand if the recent media coverage of law enforcement issues has changed your view on law enforcement in any way.

18. Raise your hand if you have strong feelings, in either direction, about the Black Lives Matter movement.

19. Raise your hand if you have heard about this case in the news or through social media.

20. Raise your hand if you have seen the in-car video of this event in the news or through social media.

21. Raise your hand if you have already reached any decisions or judgments about either Ms. Whitlatch's or Mr. Wingate's conduct.

DATED this 8th day of August, 2016.

CHRISTIE LAW GROUP, PLLC

By /s/ Ann E. Trivett

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